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April 30, 2020

***Via Electronic Filing***

Honorable Joseph A. Dickson, U.S.M.J.  
United States Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

Re: YAL, et al. v. Trustees of Montclair State Univ., et al.  
Docket No.: 2:20-cv-00508-BRM-JAD

Dear Judge Dickson:

I represent Defendants, Rose L. Cali, Mary A. Comito, Dr. Francis M. C. Cuss, George J. Hiltzik, Lawrence R. Inserra, Jr., Douglas L. Kennedy, Ralph A. LaRossa, Jean Marc De Grandpre, John L. McGoldrick, William T. Mullen, Preston D. Pinkett III, Kent Sluyter, Nikita Williams, Karen Pennington, Margaree Coleman-Carter, Paul M. Cell, Kaluba Chipepo, Yolanda Alvarez, Hamal Strayhorn and Susan A. Cole, in the above-referenced matter.

Defendants' response to Plaintiffs' Complaint was initially due on February 11, 2020. After Defendants requested the clerk's extension, they then sought another extension due to the complexity of the issues involved, and Your Honor, pursuant to a February 24, 2020 Order, extended the deadline until March 26, 2020. (D.E. #11). Following the COVID-19 pandemic, however, this Court issued Standing Order 2020-04, which extended all deadlines between March 25, 2020 and April 30, 2020 for forty-five (45) days, making the new deadline for Defendants' response currently due on May 11, 2020.



Unfortunately, due to the multitude of COVID-19-related litigation issues that have arisen and that have demanded our immediate time and attention, I am requesting an additional thirty (30) days in order for Defendants to respond to the Plaintiffs' Complaint. If granted, the new response date would be **Wednesday, June 10, 2020**.

I thank Your Honor for your kind consideration of this application.

Respectfully submitted,

GURBIR S. GREWAL  
ATTORNEY GENERAL OF NEW JERSEY

By: Michael R. Sarno  
Michael R. Sarno  
Deputy Attorney General

cc: All counsel of record (via ECF)